

EXHIBIT 2

Subject: Re: FWC - Consolidated Discovery

Date: Monday, July 26, 2021 at 11:47:02 AM Eastern Daylight Time

From: Corey Stern <CStern@levylaw.com>

To: Campbell, James M. <jmcampbell@campbell-trial-lawyers.com>

CC: Devine, Alaina N. <ADevine@campbell-trial-lawyers.com>

I'm suggesting every party that has documents provided a list of what's been produced; and that every party also provide a list of it/they have produced, so all parties can determine if/what they're missing.

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(212)605-6290 (facsimile)
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On Jul 26, 2021, at 10:43 AM, Campbell, James M. <jmcampbell@campbell-trial-lawyers.com> wrote:

Corey, I don't understand what you are proposing or what you are asking VNA to do. If you could describe the proposal that would be helpful. You may recall that VNA proposed a universal document repository at the outset of the litigation, and after a hearing with Judge Levy, none of the other parties supported the proposal. Are you suggesting something different?

Jim Campbell
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Cell: 617-797-8880
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On Jul 22, 2021, at 2:51 PM, Corey Stern <cs Stern@levylaw.com> wrote:

Do you all plan on participating in this?

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From: Erickson, Philip <PErickson@plunkettcooney.com>


Date: Monday, July 5, 2021 at 7:54 AM

To: Corey Stern <CStern@levylaw.com>, Bettenhausen, Margaret (AG) <BettenhausenM@michigan.gov>

Cc: Devine, Alaina N. <ADevine@campbell-trial-lawyers.com>, Jim Campbell <jmcampbell@campbell-trial-lawyers.com>, William Kim <wkim@cityofflint.com>, Wayne B. Mason <wayne.mason@faegredrinker.com>, Patrick Lanciotti <PLanciotti@napolilaw.com>, Hunter Shkolnik <Hunter@napolilaw.com>, Renner Walker <RWalker@Levylaw.com>, Sheldon Klein <klein@butzel.com>, Susan E. Smith <SSmith@bdlaw.com>, Craig Thompson <cthompson@swappc.com>, Kuhl, Richard (AG) <KuhlR@michigan.gov>, TMendel <TMendel@bsdd.com>, Theodore Leopold <tleopold@cohenmilstein.com>, Emmy Levens <elevens@cohenmilstein.com>, Jessica Weiner <jweiner@cohenmilstein.com>, Jayson Blake <jdblake@mcaldpinelawfirm.com>, Gambill, Nathan (AG) <GambillN@michigan.gov>, Cavanagh, Charles (AG) <CavanaghC2@michigan.gov>, Deborah Greenspan <DGreenspan@blankrome.com>

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We will be happy to provide a list of our productions

	<p>Philip A. Erickson</p> <p>Plunkett Cooney Attorneys & Counselors at Law T 517.324.5608 C 517.230.1450</p> <p>bio office vcard web linkedin</p>
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From: Corey Stern <CStern@levylaw.com>

Sent: Friday, July 2, 2021 12:02 PM

To: Bettenhausen, Margaret (AG) <BettenhausenM@michigan.gov>

Cc: Devine, Alaina N. <ADevine@campbell-trial-lawyers.com>; Jim Campbell <jmcampbell@campbell-trial-lawyers.com>; William Kim <wkim@cityofflint.com>; Wayne B. Mason <wayne.mason@faegredrinker.com>; Erickson, Philip <PErickson@plunkettcooney.com>; Patrick Lanciotti <PLanciotti@napolilaw.com>; Hunter Shkolnik <Hunter@napolilaw.com>; Renner Walker <RWalker@Levylaw.com>; Sheldon Klein <klein@butzel.com>; Susan E. Smith <SSmith@bdlaw.com>; Craig Thompson <cthompson@swappc.com>; Kuhl, Richard (AG) <KuhlR@michigan.gov>; TMendel <TMendel@bsdd.com>; Theodore Leopold <tleopold@cohenmilstein.com>; Emmy Levens <elevens@cohenmilstein.com>; Jessica Weiner <jweiner@cohenmilstein.com>; Jayson Blake <jdblake@mcaldpinelawfirm.com>; Gambill, Nathan (AG) <GambillN@michigan.gov>; Cavanagh, Charles (AG) <CavanaghC2@michigan.gov>; Deborah Greenspan <DGreenspan@blankrome.com>

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[EXTERNAL]

Thank you.

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On Jul 2, 2021, at 2:01 PM, Bettenhausen, Margaret (AG)
<BettenhausenM@michigan.gov> wrote:

Corey-

We have no problem with that approach. I have copied Nate Gambill and Charlie Cavanaugh from our office. Nate is lead on the state-court litigation in the People's case.

-Margaret

Margaret Bettenhausen (she/her)
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Michigan Department of Attorney General
Environment, Natural Resources,
and Agriculture Division
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-----Original Message-----

From: Corey Stern <CStern@levylaw.com>
Sent: Friday, July 2, 2021 1:26 PM
To: Devine, Alaina N. <adevine@campbell-trial-lawyers.com>; Jim Campbell <jmcampbell@campbell-trial-lawyers.com>; William Kim <wkim@cityofflint.com>; Wayne B. Mason <wayne.mason@faegredrinker.com>; PErickson@plunkettcooney.com; Patrick Lanciotti <PLanciotti@napolilaw.com>; Hunter Shkolnik <Hunter@napolilaw.com>; Renner Walker <RWalker@Levylaw.com>; Sheldon Klein <klein@butzel.com>; Susan E. Smith <SSmith@bdlaw.com>; Craig Thompson <cthompson@swappc.com>; Kuhl, Richard (AG) <KuhlR@michigan.gov>; Bettenhausen, Margaret (AG) <BettenhausenM@michigan.gov>; TMendel <tmendel@bsdd.com>; Theodore Leopold <tleopold@cohenmilstein.com>; Emmy Levens <elevens@cohenmilstein.com>; Renner Walker <RWalker@Levylaw.com>; Jessica Weiner <jweiner@cohenmilstein.com>; Emmy Levens <elevens@cohenmilstein.com>; Jayson Blake <jeblake@mcaldinlawfirm.com>
Cc: Deborah Greenspan <DGreenspan@blankrome.com>
Subject: FWC - Consolidated Discovery

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All:

Since the beginning of the litigation there have been many, many discovery productions.

This group for the most part has propounded virtually all of the

discovery.

I think it would be beneficial for us to have a master production list, so we are all on the same page as to what has been produced.

Our office is happy to take the lead on it, but I'm hoping that by agreement everyone can provide their lists of what they believe has been produced.

Please share your thoughts, if you have any, as well As your willingness to participate in this exercise.

Best,

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